

1 WILLIAM C. DEVINE, II, ESQ.
 2 Nevada Bar No. 10874
3 DEVINE LAW FIRM, PLLC
 4 5940 South Rainbow Blvd.
 5 Las Vegas, Nevada 89118
 6 Tel: (702) 515-1500
 Fax: (702) 577-1934
 E-Mail: william@devinelawfirm.com
7 Attorney for Debtor
 8 **JOANNE W. ENG**

9
10 UNITED STATES BANKRUPTCY COURT
11 FOR THE DISTRICT OF NEVADA

12 In re:
 13
 14 JOANNE W. ENG,
 15 Debtor.

BK Case No. 19-12981-mkn
 Chapter 13
 Judge: Hon. Mike K. Nakagawa
 Trustee: Kathleen A. Leavitt
 Hearing Date: TBD
 Hearing Time: TBD

16 **MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR**

17 Pursuant to Nevada Supreme Court Rule 46 and Local Rule IA 11-6 of the United States
 18 District Court for the District of Nevada, attorney William Devine II, Esq., of DEVINE LEGAL
 19 GROUP ("Counsel"), attorney of record for Debtor JOANNE W. ENG ("Debtor"), moves this
 20 Court for an Order permitting Counsel to withdraw as attorney of record for Debtor in any and
 all matters before this Court.

21 This Motion is made and based upon the papers, pleadings and documents on file
 22 herein, the Points and Authorities that follow hereinafter, and upon such arguments as may be
 23 adduced at the time of the hearing.

24 **POINTS AND AUTHORITIES**

25 Nevada Supreme Court Rule 46 reads as follows:

26 **Rule 46. Withdrawal or change of attorney.** The attorney in an
 27 action or special proceeding may be changed at any time before
 judgment or final determination as follows:

- 28 1. Upon consent of the attorney, approved by the client.
 2. Upon the order of the court or judge thereof on the application of
 the attorney or the client.

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1 After judgment or final determination, an attorney may withdraw as
 2 attorney of record at any time upon the attorney's filing a withdrawal,
 3 with or without the client's consent

4 Local Rule IA 11-6(b) of the United States District Court for the District of Nevada reads
 5 as follows:

6 (b) If an attorney seeks to withdraw after appearing in a case, the
 7 attorney must file a motion or stipulation and serve it on the affected
 8 client and opposing counsel. The affected client may, but is not required
 9 to, file a response to the attorney's motion within 14 days of the filing of
 10 the motion, unless the court orders otherwise.

11 Local Rule IA 11-6(e) of the United States District Court for the District of Nevada reads
 12 as follows:

13 (e) Except for good cause shown, no withdrawal or substitution will be
 14 approved if it will result in delay of discovery, the trial, or any hearing in
 15 the case. Where delay would result, the papers seeking leave of the court
 16 for the withdrawal or substitution must request specific relief from the
 17 scheduled discovery, trial, or hearing. If a trial setting has been made, an
 18 additional copy of the moving papers must be provided to the clerk for
 19 immediate delivery to the assigned district judge, bankruptcy judge, or
 20 magistrate judge.

21 As set forth in the Declaration of Counsel William Devine II, Esq., attached as
 22 Exhibit "1", Counsel was retained for the Debtor in the above-captioned matter to substitute
 23 in as attorney of record for her original counsel to attempt to get the relief from stay order set
 24 aside due to misrepresentations in scope of relief requested by creditor's attorney; to
 25 represent Debtor in a stay violation motion against creditor for exceeding the present stay
 26 relief order in place; and represent client in the adversary proceeding which was removed
 27 from San Francisco Superior Court.

28 This court ultimately entered a modified relief from stay order, and the adversary
 29 proceeding was remanded back to the court in San Francisco, leaving the only remaining
 30 matter being prosecuting the sanctions/contempt motion.

31 The Debtor and Creditor had lengthy negotiations regarding settling the matter,
 32 participated in a court ordered settlement conference and came very close to settling the
 33 claims at that time but ultimately were unable to settle at that time. However, after obtaining
 34 a continuance of the evidentiary hearing that this Court had previously scheduled, the parties
 35 were able to come to an agreement and Debtor's Counsel made the offer to Creditor's counsel
 36 as requested by Debtor on January 23rd, 2024, mirroring a similar offer Creditor's counsel had

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1 made previously. Debtor's counsel agreed to draft the settlement agreement, however due to
 2 workload and scheduling issues, had not yet finalized the drafting of the settlement
 3 agreement. Creditor's counsel ultimately drafted and sent over the settlement agreement on
 4 March 15th, 2024, as agreed by Counsel.

5 During the time from January 23rd, 2024, to March 15th, 2024, Creditor Legal Recovery
 6 LLC filed for protection under Chapter 11 in the Northern District of California, case 24-30074-
 7 DM, filed February 6th, 2024. See Court Docket as of 3/26/2024, Exhibit "2" attached hereto.
 8 For various reasons that can be explained by Debtor, Debtor has not signed the settlement
 9 agreement and appears unwilling to do so, and wishes to proceed with the evidentiary
 10 hearing. Due to having concluded the matter with a settlement, Debtor's Counsel and
 11 Creditor's Counsel ceased discovery including Debtor's response to discovery propounded by
 12 Creditor's Counsel and a deposition of Debtor scheduled by Creditor's counsel.

13 Due to the bankruptcy filing of Legal Recovery LLC, and that the pending Motion for
 14 sanctions is a claim for money against Legal Recovery LLC, upon information and belief, such
 15 motion and determination of damages may be stayed by Legal Recovery LLC's Chapter 11
 16 bankruptcy, which may necessitate such evidentiary hearing to be postponed.

17 Moreover, irreconcilable differences have arisen between Debtor and Debtor's
 18 Counsel, which make continued representation impossible.

19 Based upon the above and foregoing, William Devine II, Esq, of DEVINE LEGAL GROUP
 20 hereby requests this Court enter an Order permitting counsel to withdraw as attorney of
 21 record for Debtor JOANNE W. ENG such that she may continue to represent herself moving
 22 forward, or to retain substitute counsel to represent her moving forward.

23 Dated this 26th day of March, 2024.

24 DEVINE LEGAL GROUP

25 
 26 William C. Devine, II (NV Bar #10874)
 27 5940 S. Rainbow Blvd.
 28 Las Vegas, Nevada 89118
Attorney for Debtor, Joanne W. Eng

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2 **EXHIBIT “1”**
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1 **DECLARATION OF WILLIAM DEVINE II, ESQ**

- 2 1. I, WILLIAM DEVINE II, ESQ of DEVINE LEGAL GROUP do hereby state under penalty of
3 perjury that the foregoing is true and correct.
- 4 2. I am the attorney for Debtor JOANNE W. ENG in this pending Chapter 13 bankruptcy
5 petitioner.
- 6 3. Debtor's case was filed May 11, 2019, and the case number is 19-12981-mkn.
- 7 4. I was retained by the Debtor in the above-captioned matter to substitute in as attorney
8 of record for her original counsel to attempt to get the relief from stay order set aside
9 due to misrepresentations in scope of relief requested by creditor's attorney; to
10 represent Debtor in a stay violation motion against creditor for exceeding the present
11 stay relief order in place; and represent client in the adversary proceeding which was
12 removed from San Francisco Superior Court.
- 13 5. This court ultimately entered a modified relief from stay order, and the adversary
14 proceeding was remanded back to the court in San Francisco, leaving the only
15 remaining matter being prosecuting the sanctions/contempt motion.
- 16 6. Creditor is being represented by Attorney Michael Brooks with Hutchison & Steffen,
17 PLLC ("Creditor's Counsel").
- 18 7. I have had lengthy settlement negotiations with Creditor's Counsel, including
19 participation in a court ordered settlement conference where we came very close to
20 settling the claims at that time.
- 21 8. The evidentiary hearing for Debtor's Motion regarding sanctions/contempt against
22 Creditor Legal Recovery LLC was continued to the present scheduled date to allow the
23 Parties to continue settlement negotiations, as well as limited discovery and a
24 deposition of Debtor.
- 25 9. Shortly thereafter, on January 23rd, 2024, Debtor requested Counsel offer a settlement
26 to Creditor's Counsel, nearly mirroring a prior settlement offer they had made.
- 27 10. Creditor's Counsel responded accepting the offer with a contingency that I draft the
28 settlement agreement.

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- 1 11. Due to my workload and other matters, I had not yet drafted the agreement by the first
2 full week of March 2024 and Creditor's Counsel offered to draft the settlement
3 agreement, which I agreed via phone.
- 4 12. Creditor's counsel sent over the settlement agreement on March 15th, 2024, and I
5 forward such to my client, Debtor Joanne W. Eng.
- 6 13. During the time from January 23rd, 2024, to March 15th, 2024, Creditor Legal Recovery
7 LLC filed for protection under Chapter 11 in the Northern District of California, case 24-
8 30074-DM, filed February 6th, 2024.
- 9 14. A day or two after agreeing that Creditor's Counsel would draft the settlement
10 agreement but before he sent the settlement agreement over on March 15th, 2024,
11 Debtor emailed me with what appeared to be her decision not to move forward with
12 the settlement as previously agreed.
- 13 15. However, both myself and Creditor's Counsel had ceased discovery including Debtor's
14 requirement to respond to discovery propounded by Creditor's Counsel and a
15 deposition of Debtor scheduled by Creditor's counsel.
- 16 16. Based on that and subsequent communications I have had with Debtor, irreconcilable
17 differences have arisen between Debtor and myself which make continued
18 representation impossible.
- 19 17. Due to the bankruptcy filing of Legal Recovery LLC, it is my understanding that Debtor
20 may need to seek relief from stay in the Legal Recovery LLC bankruptcy case to
21 continue prosecuting this contempt/sanctions claim against Legal Recovery LLC. As
22 such, I believe that the evidentiary hearing may need to be postponed, and thus Debtor
23 would not be prejudiced by my withdrawal and would have time to obtain
24 substitute counsel for this Nevada matter.
- 25 18. Therefore, I request that I be allowed to withdraw as attorney of record for Debtor
26 Joanne W. Eng.

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1 19. Until Debtor is able to secure replacement counsel, I request that all notices,
2 correspondence, and pleadings be forwarded to Debtor directly at the following
3 address:

**Joanne W. Eng.
10120 W. Flamingo Road, Suite 4
Las Vegas, Nevada 89148**

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 26th day of March, 2024.

William Denehy

William Devine II, Esq.

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2 **EXHIBIT “2”**
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4 **Legal Recovery LLC**
5 **California Bankruptcy Docket**
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Subchapter_V, PlnDue, DsclsDue

**U.S. Bankruptcy Court
California Northern Bankruptcy Court (San Francisco)
Bankruptcy Petition #: 24-30074**

Assigned to: Judge Dennis Montali
Chapter 11
Voluntary
Asset

Date filed: 02/06/2024
341 meeting: 04/09/2024
Deadline for filing claims: 05/13/2024
Deadline for objecting to discharge: 05/03/2024

Debtor
Legal Recovery LLC
PO Box 225254
San Francisco, CA 94122
SAN FRANCISCO-CA
Tax ID / EIN: 46-5306698

represented by **Leeds Disston**
300 Frank H Ogawa Plz, Ste 205
Oakland, CA 94612-2060
(510) 835-8110

Trustee
Gina R. Klump
Gina R. Klump, Trustee
11 5th Street, Suite 102
Petaluma, CA 94952
707-778-0111

U.S. Trustee
Office of the U.S. Trustee / SF
Phillip J. Burton Federal Building
450 Golden Gate Ave. 5th Fl., #05-0153
San Francisco, CA 94102
(415)705-3333

represented by **Trevor Ross Fehr**
Office of the U.S. Trustee
501 I Street, Suite 7-500
Sacramento, CA 95814
(408) 535-5525
Email: trevor.fehr@usdoj.gov

Christina Lauren Goebelsmann
Department of Justice
450 Golden Gate Ave.
5th Floor
Ste 05-0153
San Francisco, CA 94102
415-705-3365
Email: christina.goebelsmann@usdoj.gov

Filing Date	#	Docket Text
02/06/2024	<u>1</u> (11 pgs)	Chapter 11 Voluntary Petition for Non-Individual, Fcc Amount \$1,738.00. Filed by Legal Recovery LLC . Application to Employ Counsel by Debtor due by 3/7/2024. Order Meeting of Creditors due by 2/13/2024.Incomplete Filings due by 2/20/2024. (ka) Modified on 2/6/2024 (ka). (Entered: 02/06/2024)
02/06/2024	2	First Meeting of Creditors with 341(a) meeting to be held on 3/4/2024 at 01:00 PM via Tele/ Videoconference - www.canb.uscourts.gov/calendars. Proofs of Claims due by 6/3/2024. (Scheduled Automatic Assignment) (Entered: 02/06/2024)
02/06/2024		Receipt Number 27BM8DJP, Fcc Amount \$1,738.00 (RE: related document(s)) Voluntary Petition (Chapter 11)). (bg) (Entered: 02/06/2024)
02/06/2024	<u>3</u> (2 pgs; 2 docs)	Order to File Required Documents and Notice of Automatic Dismissal . (ka) (Entered: 02/06/2024)
02/06/2024	<u>4</u> (3 pgs; 2 docs)	Notice of Chapter 11 Bankruptcy Case, Meeting of Creditors, and Deadlines (Generated) (ka) (Entered: 02/06/2024)

02/06/2024	<u>5</u> (3 pgs; 2 docs)	Order and Notice of Chapter 11 Status Conference Status Conference scheduled for 3/22/2024 at 10:00 AM in/via Tele/Videoconference - www.canb.uscourts.gov/calendars. Status Conference Statement due by 3/15/2024 (ka) (Entered: 02/06/2024)
02/07/2024	<u>6</u> (1 pg)	Notice of Appearance and Request for Notice by Trevor Ross Fehr. Filed by U.S. Trustee Office of the U.S. Trustee / SF (Fehr, Trevor) (Entered: 02/07/2024)
02/07/2024	<u>7</u> (2 pgs; 2 docs)	Order for Payment of State and Federal Taxes (admin) (Entered: 02/07/2024)
02/08/2024	<u>8</u> (4 pgs)	BNC Certificate of Mailing - Meeting of Creditors. (RE: related document(s) <u>4</u> Generate 341 Notices). Notice Date 02/08/2024. (Admin.) (Entered: 02/08/2024)
02/08/2024	<u>9</u> (2 pgs)	BNC Certificate of Mailing (RE: related document(s) <u>3</u> Order to File Missing Documents). Notice Date 02/08/2024. (Admin.) (Entered: 02/08/2024)
02/08/2024	<u>10</u> (4 pgs)	BNC Certificate of Mailing (RE: related document(s) <u>5</u> Order and Notice of Status Conference Chp 11). Notice Date 02/08/2024. (Admin.) (Entered: 02/08/2024)
02/10/2024	<u>11</u> (3 pgs)	BNC Certificate of Mailing - Payment of State and Fed Taxes. (RE: related document(s) <u>7</u> Order for Payment of State and Federal Taxes). Notice Date 02/10/2024. (Admin.) (Entered: 02/10/2024)
02/20/2024	<u>12</u> (5 pgs)	Amended Voluntary Petition (choose to proceed under SubV). Filed by Debtor Legal Recovery LLC (lj). Related document(s) <u>1</u> Voluntary Petition (Chapter 11) filed by Debtor Legal Recovery LLC. Modified on 2/26/2024 (jf). (Entered: 02/20/2024)
02/20/2024	<u>13</u> (31 pgs)	Summary of Assets and Liabilities for Non-Individual , Schedule A/B: Property - for Non-Individual , Schedule E/F : Creditors Who Have Unsecured Claims for Non-Individual , Schedule G: for Non-Individual , Schedule H: for Non-Individual , Declaration Under Penalty of Perjury for Non-Individual Debtors , Statement of Financial Affairs for Non-Individual (RE: related document(s) <u>1</u> Voluntary Petition (Chapter 11)). Filed by Debtor Legal Recovery LLC (lj) (Entered: 02/20/2024)
02/20/2024	<u>14</u> (4 pgs; 2 docs)	Amendment to List of Creditors . Fee Amount \$34 , Amended Schedule D for Non-Individual Creditors Having Claims Secured by Property Filed by Debtor Legal Recovery LLC (Attachments: # <u>1</u> PDF of Amended Schedule D) (lj) Modified on 2/20/2024 (lj). (Entered: 02/20/2024)
02/20/2024	<u>15</u> (2 pgs)	Chapter 11 or Chapter 9 Cases Non-Individual: List of Creditors Who Have 20 Largest Unsecured Claims Against You and Are Not Insiders Filed by Debtor Legal Recovery LLC (lj) (Entered: 02/20/2024)
02/20/2024	<u>16</u> (1 pg)	List of Equity Security Holders Filed by Debtor Legal Recovery LLC (lj) (Entered: 02/20/2024)
02/20/2024		Receipt Number 27C1TDOO, Fee Amount \$34.00 (RE: related document(s) <u>14</u> Amended Creditor Matrix (Fee), Schedule D). (bg) (Entered: 02/20/2024)
02/20/2024	<u>17</u> (6 pgs)	Notice of Motion and Motion to Convert Debtor's Chapter 11 into Chapter 7 and/or to Appointment of Trustee or Examiner together with Memorandum of Points and Authorities in Support with Proof of Service. Fee Amount \$15 Filed by Requestor Joanne Eng. DEFECTIVE ENTRY: Notice of Hearing or Opportunity for Hearing must be filed separately; Party filer to pay required filing fee. (lj) (Entered: 02/20/2024)
02/20/2024	<u>18</u> (5 pgs)	Declaration of Joanne Eng in support of Her Motion to Convert Debtor's Chapter 11 into Chapter 7 and/or to Appointment of Trustee or Examiner. (RE: related document(s) <u>17</u> Motion to Convert Case to Chapter 7). Filed by Requestor Joanne Eng (lj) (Entered: 02/20/2024)
02/21/2024	<u>19</u> (2 pgs; 2 docs)	Notice Letter of Deficiency (RE: related document(s) <u>17</u> Notice of Motion and Motion to Convert Debtor's Chapter 11 into Chapter 7 and/or to Appointment of Trustee or Examiner together with Memorandum of Points and Authorities in Support with Proof of Service. Fee Amount \$15 Filed by Requestor Joanne Eng. DEFECTIVE ENTRY: Notice of Hearing or Opportunity for Hearing must be filed separately; Party filer to pay required filing fee. (lj)). (lj) (Entered: 02/21/2024)
02/21/2024	<u>20</u> (2 pgs)	Request for Notice Filed by Creditor Martin Eng (Voisenat, Phyllis) (Entered: 02/21/2024)

02/22/2024	<u>21</u> (2 pgs)	Appointment of Trustee and Approval of Bond Trustee Gina R. Klump added to the case. <i>Notice of Appointment of Subchapter V Trustee</i> . (Goebelmann, Christina) (Entered: 02/22/2024)
02/22/2024	<u>22</u> (2 pgs)	Certificate of Service <i>Notice of Appointment of Subchapter Trustee</i> (RE: related document(s) <u>21</u> Appointment of Trustee and Approval of Bond). Filed by U.S. Trustee Office of the U.S. Trustee / SF (Goebelmann, Christina) (Entered: 02/22/2024)
02/23/2024	<u>23</u> (1 pg)	Request for Notice Filed by Trustee Gina R. Klump (Klump, Gina) (Entered: 02/23/2024)
02/23/2024	<u>24</u> (4 pgs; 2 docs)	Order Resetting Time of Hearing (RE: related document(s) <u>17</u> Motion to Convert Case to Chapter 7 filed by Requestor Joanne Eng). Hearing scheduled for 3/29/2024 at 10:00 AM in/via Tele/Videoconference - www.canb.uscourts.gov/calendars. (lp) (Entered: 02/23/2024)
02/23/2024	<u>25</u> (15 pgs)	Adversary case 24-03009, 14 (Recovery of money/property - other), 71 (Injunctive relief - reinstatement of stay) Complaint by Martin Eng against Legal Recovery, LLC. Fcc Amount \$350. (Voisenat, Phyllis) (Entered: 02/23/2024)
02/23/2024	<u>26</u> (2 pgs)	BNC Certificate of Mailing (RE: related document(s) <u>19</u> Notice). Notice Date 02/23/2024. (Admin.) (Entered: 02/23/2024)
02/24/2024		Receipt Number 27C5SCKR, Fcc Amount \$15.00 (RE: related document(s) <u>17</u> Motion to Convert Case to Chapter 7 Fcc Amount \$15, <u>19</u> Notice). (bg) (Entered: 02/26/2024)
02/25/2024	<u>27</u> (5 pgs)	BNC Certificate of Mailing (RE: related document(s) <u>24</u> Order To Set Hearing). Notice Date 02/25/2024. (Admin.) (Entered: 02/25/2024)
02/26/2024		Meeting of Creditors-Amended 341(a) meeting to be held on 3/4/2024 at 01:00 PM Tele/Videoconference - www.canb.uscourts.gov/calendars Last day to oppose discharge or dischargeability is 5/3/2024 Proofs of Claims due by 5/13/2024 (jf) (Entered: 02/26/2024)
02/26/2024	<u>28</u> (3 pgs; 2 docs)	Amended Notice of Chapter 11 Bankruptcy Case, Meeting of Creditors, and Deadlines (Generated) (jf) (Entered: 02/26/2024)
02/27/2024	<u>29</u> (3 pgs)	Summons Service Executed on Legal Recovery LLC 2/26/2024 . (Voisenat, Phyllis) (Entered: 02/27/2024)
02/28/2024	<u>30</u> (4 pgs)	BNC Certificate of Mailing - Meeting of Creditors. (RE: related document(s) <u>28</u> Generate 341 Notices). Notice Date 02/28/2024. (Admin.) (Entered: 02/28/2024)
03/05/2024		Statement Adjourning Meeting of 341(a) Meeting of Creditors. Meeting of Creditors Continued. <i>Debtor's Counsel did not appear.</i> 341(a) meeting to be held on 3/19/2024 at 09:00 AM Tele/Videoconference - www.canb.uscourts.gov/calendars (Fehr, Trevor) (Entered: 03/05/2024)
03/07/2024	<u>31</u> (2 pgs)	Application to Employ Leeds Disston as Debtor's Attorney Filed by Debtor Legal Recovery LLC (lj) (Entered: 03/07/2024)
03/07/2024	<u>32</u> (2 pgs)	Disclosure of Compensation of Attorney for Debtor (lj) (Entered: 03/07/2024)
03/08/2024		Returned Mail: Mail originally sent on 02/23/2024 returned as undeliverable. Returned Mail: The following order sent to Joanne Eng 10120 W Flamingo Rd, Ste 4 Las Vegas, NV 89147-8394 on 02/23/2024 was returned as undeliverable: Notice (ADI Administrator court); (Entered: 03/08/2024)
03/13/2024	<u>33</u> (7 pgs)	Objection and Reservation of Rights of The U.S. Trustee to the Application to Employ The Law Offices of Leeds Disston as Attorney for the Debtor In Possession. (RE: related document(s) <u>31</u> Application to Employ). Filed by U.S. Trustee Office of the U.S. Trustee / SF (Fehr, Trevor) (Entered: 03/13/2024)
03/13/2024	<u>34</u> (2 pgs)	Certificate of Service (RE: related document(s) <u>33</u> Objection). Filed by U.S. Trustee Office of the U.S. Trustee / SF (Fehr, Trevor) (Entered: 03/13/2024)
03/15/2024	<u>35</u> (3 pgs)	Status Conference Statement (RE: related document(s) <u>5</u> Order and Notice of Status Conference Chp 11). Filed by Debtor Legal Recovery LLC (lj) (Entered: 03/15/2024)

03/15/2024	<u>36</u> (4 pgs)	Small Business Monthly Operating Report for Filing Period February, 2024 Filed by Debtor Legal Recovery LLC (lj) (Entered: 03/15/2024)
03/18/2024	<u>37</u> (4 pgs)	Opposition to Joanne Eng's Motion to Convert Debtor's Chapter 11 into Chapter 7 together with Declaration of Leeds Disston in opposition of Motion to Convert (RE: related document(s) <u>17</u> Motion to Convert Case to Chapter 7). Filed by Debtor Legal Recovery LLC (lj) (Entered: 03/18/2024)
03/18/2024	<u>38</u> (1 pg)	Request for Notice Filed by Interested Party John A. Vos (Vos, John) Modified on 3/18/2024 (jf). (Entered: 03/18/2024)
03/18/2024	<u>39</u> (30 pgs)	Reply Of Joanne Eng To Opposition To Motion To Convert Debtor's Chapter 11 into Chapter 7 and/or To Appointment of Trustee or Examiner together with Declaration of Joanne Eng in Support of Her Reply with attached Exhibits. (RE: related document(s) <u>37</u> Opposition Brief/Memorandum, Declaration). Filed by Requestor Joanne Eng (lj) (Entered: 03/18/2024)
03/19/2024		Statement Adjourning Meeting of 341(a) Meeting of Creditors. Meeting of Creditors Continued . Debtor appeared with Counsel. 341(a) meeting to be held on 4/9/2024 at 02:00 PM Tele/Videoconference - www.canb.uscourts.gov/calendars (Fehr, Trevor) (Entered: 03/19/2024)
03/21/2024	<u>40</u> (4 pgs)	Order on Motion for Clarification of Order - Entered in US Bankruptcy Court, District of Nevada, Case No. 19-12981-MKN (bg) (Entered: 03/21/2024)
03/22/2024		Hearing held and continued. Leeds Disston appeared for debtor. Trevor Fehr appeared for the U.S. Trustee. Phyllis Voisnac appeared for Martin Eng. Joanne Eng appeared. Ms. Eng's Motion to Convert, docket no. 17, scheduled for 3/29 at 10:00 a.m. is continued to 4/3/24 at 2:30 p.m. (RE: related document(s) <u>5</u> Order and Notice of Status Conference Chp 11). Hearing scheduled for 04/03/2024 at 02:30 PM in/via Tele/Videoconference - www.canb.uscourts.gov/calendars. (lp) (Entered: 03/22/2024)
03/22/2024	<u>41</u> (1 pg)	» The Audio File attached to the PDF includes several hearings. Court Date & Time [3/22/2024 10:00:00 AM]. File Size [170537 KB]. Run Time [02:57:39]. (admin). (Entered: 03/22/2024)
03/25/2024		Hearing Continued. The hearing on 3/29 at 10:00 a.m. is continued to 4/3/24 at 2:30 p.m. pursuant to a hearing held on 3/22/24. (RE: related document(s) <u>17</u> Motion to Convert Case to Chapter 7 Fee Amount \$15). Hearing scheduled for 04/03/2024 at 02:30 PM in/via Tele/Videoconference - www.canb.uscourts.gov/calendars. (lp) (Entered: 03/25/2024)

PACER Service Center			
Transaction Receipt			
03/26/2024 10:28:06			
PACER Login:	devinewc	Client Code:	
Description:	Docket Report	Search Criteria:	24-30074 Fil or Ent: filed From: 1/26/2023 To: 3/26/2024 Doc From: 0 Doc To: 99999999 Term: included Headers: included Format: html Page counts for documents: included
Billable Pages:	4	Cost:	0.40

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2 **EXHIBIT “3”**
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4 **Proposed Order**
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6 WILLIAM C. DEVINE, II, ESQ.
7 Nevada Bar No. 10874
8 **DEVINE LAW FIRM, PLLC**
9 5940 South Rainbow Blvd.
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E-Mail: william@devinelawfirm.com
11 *Attorney for Debtor*
JOANNE W. ENG
12

13 **UNITED STATES BANKRUPTCY COURT**
14 **FOR THE DISTRICT OF NEVADA**

15 *In re:*

16 JOANNE W. ENG,

17 Debtor.

BK Case No. 19-12981-mkn
Chapter 13
Judge: Hon. Mike K. Nakagawa
Trustee: Kathleen A. Leavitt

Hearing Date:
Hearing Time:

18
19
20 **[PROPOSED]**
21 **ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR**
22 THIS MATTER having come before the Court for a hearing on the above-listed date and
time, on Attorney William Devine II, Esq.'s Motion to Withdraw as Counsel for Debtor; and
based upon the pleadings and papers on file herein, and good cause appearing:
25 IT IS HEREBY ORDERED THAT, Attorney William Devine, II, Esq.'s Motion to Withdraw as
Counsel for Debtor is granted;
27 IT IS FURTHER ORDERED THAT William Devine II, Esq., is hereby withdrawn as counsel of
record for Debtor Joanne W. Eng in this matter before this Court.
28

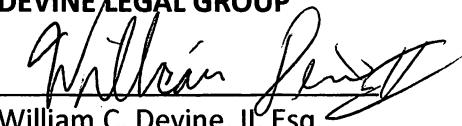
1 IT IS FURTHER ORDERED THAT all further communications to Debtor Joanne W. Eng
2 shall be sent to her at:

3 Joanne W. Eng.
4 10120 W. Flamingo Road, Suite 4
5 Las Vegas, Nevada 89148

6
7 IT IS SO ORDERED.

8 Submitted by:

9 **DEVINE LEGAL GROUP**

10 
William C. Devine, II, Esq.

11 Nevada Bar No. 10874
12 5940 S. Rainbow Blvd.
13 Las Vegas, Nevada 89118
14 Attorney for Debtor
15 Joanne W. Eng

16 ALTERNATIVE METHOD re: RULE 9021:

17 In accordance with LR 9021, counsel submitting this document certifies that the order
18 accurately reflects the Court's ruling and that (check one):

- 19 The Court has waived the requirement set forth in LR 9021(b)(1).
20 No party appeared at the hearing or filed an objection to the motion.
21 I have delivered a copy of this proposed order to all counsel who appeared at the
22 hearing, and any unrepresented parties who appeared at the hearing, and each
23 has approved or disapproved the order, or failed to respond, as indicated below

24 APPROVED:

25 DISAPPROVED:

26 FAILED TO RESPOND:

27 I certify that this is a case under Chapter 7 or 13, that I have served a copy of this
28 order with the motion pursuant to LR 9014(g), and that no party has objected to the
form or content of the order.

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